

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

OAK FINANCIAL GROUP, INC.,

Plaintiff,

vs.

INFINITY Q DIVERSIFIED ALPHA FUND,  
TRUST FOR ADVISED PORTFOLIOS, INFINITY  
Q CAPITAL MANAGEMENT LLC,  
CHRISTOPHER E. KASHMERICK, JOHN C.  
CHRYSTAL, ALBERT J. DIULIO, S.J., HARRY E.  
RESIS, RUSSELL B. SIMON, STEVEN J.  
JENSEN, JAMES VELISSARIS, LEONARD  
POTTER, SCOTT LINDELL, QUASAR  
DISTRIBUTORS, LLC, EISNERAMPER LLP,  
BONDERMAN FAMILY LIMITED  
PARTNERSHIP LP and INFINITY Q  
MANAGEMENT EQUITY, LLC,

Defendants.

Civil Action No. 1:21-cv-03249-FB-  
MMH

Hon. Frederic Block

**DECLARATION OF VERONICA E.  
CALLAHAN PURSUANT TO  
LOCAL RULE 1.4**

I, Veronica E. Callahan, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. Defendants James Velissaris and Infinity Q Management Equity, LLC (“IQME”)

are represented in this matter by Arnold & Porter Kaye Scholer LLP (“Arnold & Porter”). Counsel of record for James Velissaris and IQME include my colleagues Kathleen A. Reilly, Jennifer Oh, and Tyler Fink as well as myself.

2. Mr. Velissaris informed us that he will be changing counsel in this action, which

we understand relates to changing counsel for both Mr. Velissaris and IQME, necessitating our withdrawal as counsel for both Mr. Velissaris and IQME.

3. Currently, the posture of the case is as follows: No answer has been filed, no dispositive motions have been filed and no trial date has been set. This action is stayed.

4. Because this case is currently stayed, withdrawal of Arnold & Porter, Ms. Reilly, Ms. Oh, Mr. Fink and myself will not prejudice James Velissaris and IQME. Additionally, on March 10, 2023, Judge Cote granted a request to substitute Arnold & Porter with Barnes & Thornburg LLP as counsel for Mr. Velissaris in *U.S. v. Velissaris*, 22 Cr. 105 (S.D.N.Y.). In addition to Mr. Velissaris, we have notified Barnes & Thornburg LLP that we would be filing this application. We understand that Barnes & Thornburg LLP intends to file a notice of appearance in this action.

5. Arnold & Porter is not asserting a retaining or charging lien.

6. I respectfully request that the Court enter the accompanying Order allowing Arnold & Porter, Ms. Reilly, Ms. Oh, Mr. Fink and myself to withdraw as counsel of record for James Velissaris and IQME.

Dated: New York, New York  
March 31, 2023

ARNOLD & PORTER KAYE SCHOLER LLP

By:



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*Attorneys for Defendants James Velissaris and  
Infinity Q Management Equity, LLC*